

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

United States of America, *et al.*,

Plaintiff,

v.

Google LLC

Defendant.

Case No. 1:23-cv-00108-LMB-JFA

The Honorable Leonie M. Brinkema

**THE TRADE DESK, INC.’S MOTION TO SEAL EXHIBITS ENTERED INTO
EVIDENCE AT TRIAL**

Pursuant to Local Rule 5(c) of the Rules of the United States District Court for the Eastern District of Virginia and the Modified Protective Order, The Trade Desk, Inc. (“The Trade Desk”), through its undersigned counsel, hereby respectfully moves this Court for an order granting The Trade Desk’s motion to seal certain of the parties’ exhibits entered into evidence at trial (“Motion”). The Trade Desk seeks leave to file under seal and redact the following documents:

- Certain exhibits identified in Plaintiffs’ Trial Exhibit List (Dkt. No. 892-1) and Defendant Google LLC’s Trial Exhibit List (Dkt. No. 894) which are identified in Appendix A to this motion.
- Excerpts of the deposition testimony of The Trade Desk’s Chief Revenue Officer, Jed Dederick, designated as highly confidential pursuant to the Modified Protective Order, and identified in Appendices B and C to this motion.

Consistent with the local rule and this Court's Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on relevant counsel and deliver a copy to this Court in a separate container labeled "UNDER SEAL." The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court's convenience.

Date: July 26, 2024

/s/ David L. Johnson

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Attorneys for The Trade Desk, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2024, I caused a copy of the foregoing to be electronically filed using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

Date: July 26, 2024

/s/ David L. Johnson

David L. Johnson

APPENDIX A

TTD EXHIBIT NO.	TRIAL EXHIBIT NO.	RELIEF REQUESTED
Exhibit 1	DTX 1444	Under Seal
Exhibit 2	DTX 1799	Under Seal
Exhibit 3	DTX 1800	Under Seal
Exhibit 4	DTX 1801	Under Seal
Exhibit 5	PTX 1714	Under Seal
Exhibit 6	PTX 1715	Under Seal
Exhibit 7A	DTX 737	Under Seal
Exhibit 7B	DTX 319	Under Seal
Exhibit 8	DTX 523	Redactions Applied As Highlighted
Exhibit 9	DTX 823	Under Seal
Exhibit 10	DTX 1022	Under Seal
Exhibit 11	DTX 1051	Under Seal
Exhibit 12	DTX 1456	Under Seal
Exhibit 13	DTX 1084	Under Seal
Exhibit 14	DTX 1254	Under Seal
Exhibit 15	DTX 1798 and DTX122	Under Seal
Exhibit 16	DTX 1139	Under Seal
Exhibit 17	DTX 520	Under Seal
Exhibit 18	DTX 1162	Under Seal
Exhibit 19	DTX 1198	Under Seal
Exhibit 20	DTX 1447	Under Seal

Exhibit 21	DTX 1170	Under Seal
Exhibit 22	DTX 1794	Under Seal
Exhibit 23	DTX 1795	Under Seal
Exhibit 24	DTX 1797	Redactions Applied As Highlighted
Exhibit 25	DTX 1205	Under Seal
Exhibit 26	DTX 1398	Under Seal

APPENDIX B

Plaintiff's Deposition Designations of Jed Dederick's Deposition Testimony

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44	21	45	22
61	7	61	24
69	20	70	15
126	5	127	20
130	20	134	4
134	18	134	20
134	22	135	3
135	4	136	11
136	12	136	25
137	2	137	15
144	15	145	18
163	11	163	13
163	16	165	20
167	14	170	4
170	13	170	15
170	17	172	7
172	8	173	3
173	4	174	4
174	5	174	8
174	10	174	24
179	19	179	23
179	25	180	22
180	25	181	25
182	2	182	20
191	24	193	9
193	10	195	2
195	4	195	25
196	12	198	18
198	21	202	5
202	22	203	8
217	10	219	4
219	5	220	7
220	8	220	10
220	11	221	10
221	12	221	23
222	3	223	9
223	12	224	23
224	25	225	11
225	23	229	2
229	4	230	2
230	3	230	8
230	10	230	24
231	14	231	20
231	24	232	15

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233	6	234	3
235	17	235	22
236	3	236	22
236	23	237	3
237	5	238	18
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244	6	245	4
245	8	246	11
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247	22	248	19
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249	18	250	14
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250	20	251	22
251	23	252	2
252	4	252	20
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274	21	276	3
276	5	276	19
276	20	277	19
277	21	280	3

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280	6	280	14
281	2	281	5
281	7	281	14
282	11	282	15
282	17	282	21
282	23	285	4
285	11	285	13
285	15	285	16
285	17	285	19
285	21	286	12
286	15	288	13

APPENDIX C

Defendant Google LLC's Deposition Designations of Jed Dederick's Deposition Testimony

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41	7	41	10
44	2	44	4
44	12	44	25
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60	25	60	25
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123	2	123	10
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128	16	128	25
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